



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



470339

REPLY TO THE ATTENTION OF:

October 25, 2006

SR-6J

Via Certified Mail

Return Receipt Requested

Mr. Thomas Steib
Detrex Corporation
1100 N. State Road
Ashtabula, OH 44004

**RE: U.S. EPA Conditional Approval of October 2006 Preliminary Design for
Groundwater Interceptor Collection Trench / Conditional Approval of July 2006
North Sewer Investigation Work Plan - Detrex Source Control Area - Fields
Brook Superfund Site - Ashtabula, Ohio - Docket No. - V-W-98-C-450**

Dear Mr. Steib:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the October 2006 Preliminary Design for the Groundwater Interceptor Collection Trench for the Detrex Source Control Area of the Fields Brook Superfund Site. U.S. EPA approves the document and provides approval for Detrex to go forward contingent upon following conditions:

1. It appears that the gravel pack will intersect the sand seams seen in the preliminary borings. However, should the excavation ultimately identify sand seams shallower than previously seen, the depth of the gravel pack should be adjusted to a minimum of one foot above the base of the seam.
2. It does not appear that filter fabric will be placed in the trench before adding aggregates. Add filter fabric, as it would keep fines out of the gravel pack and extend the life of the trench.
3. As agreed in our October 18th meeting, a third segment should be added to extend the collection trench at least to the western fence line to ensure that there is interceptor coverage to the north of the DNAPL accumulation area seen in the G-G' cross section.
4. Detrex should add monitoring locations along the trenches. Although the sumps should be primary locations for sample collection, additional monitoring locations should be placed along the trenches. While the trenches are being pumped, the sumps will be the primary collection points. However, if pumping is stopped, groundwater could flow through the trench (and not to the sumps) and sampling just at the sumps would not be representative of groundwater along the entire trench. DNAPL, if in a trench that is not being pumped, will not move through the trench but will accumulate in the trench and will have a tendency to flow towards the sumps based on the slope in the trench bottom. However, this may be a

slow process.

5. Detrex should submit an Interceptor Trench Monitoring and Maintenance Plan within 45 days of receipt of this letter. This document should cover monitoring for groundwater and DNAPL accumulation within sumps and other monitoring points. The document should also address routine O&M issues associated with inspection and upkeep of the trenches and related equipment.
6. Once installed, the trench collection system should be regularly sampled (see #5 above) to evaluate groundwater contamination and the extent of DNAPL presence. U.S. EPA will determine the need for pumping based on the VOC results of collected water. If Detrex wishes to hold off on the installation of permanent components, it may do so as long as temporary systems put in place do not compromise the operation of the system (esp. during the cold weather months).

The U.S. EPA has also reviewed the North Sewer Investigation Work Plan. The document is approved with the following conditions:

1. According to the work plan, the trenches are to be dug to a depth below the base of the former north sewer pipe. If I remember correctly, the seep may be below the elevation of the base of the sewer. Therefore, the trenches need to be dug to at least two feet below the base of the former north sewer or two feet below the elevation of the seep, whichever is deeper.
2. In advance of excavation, discuss the utility tolerance zones both in terms of worker safety and equipment usage. Field personnel should have the equipment and experience to hand dig around utilities where appropriate to ensure no DNAPL pathways are concurrent with the utility lines. Hand digging should be discussed and coordinated with the Site Safety Officer.
3. Detrex should have equipment available and procedures in place to collect liquid DNAPL if it flows into an excavation and/or poses a potential threat to human health or the brook.
4. Health and Safety procedures should be adjusted as appropriate as a result of new information concerning recent EU8 PCB results from brook sediment. In addition, I'd like to make Detrex aware that used syringes were seen along the western edge of State Rd just north of the old North Sewer. Please advise your field personnel to exercise caution.

Please move forward with the required work and advise U.S. EPA of your anticipated field schedule. If you have any questions concerning the terms of the conditional approvals, please don't hesitate to contact me at 312-353-6564.

Sincerely,



Terese A. Van Donsel
Remedial Project Manager

cc: S. Jaffess / EPA-R5
P. Felitti / EPA-R5 ✓
T. Johnson / EPA-EPA Las Vegas
R. Williams / OEPA

T. Doll / Detrex
R. Currie / Detrex
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R. Rule / de Maximis
Site File - Fields Brook / Detrex